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February 14, 2024

BY ECF

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2103
New York, NY 10007

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MEMO ENDORSED

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Re: *Huzhou Chuangtai Rongyuan Investment Management Partnership et al v. Qin*;
      **No. 1:21-cv-09221 (KPF) – Petitioners' Request to File Redacted Documents
      in Opposition to Motion to Modify Non-Party Subpoena**

Dear Judge Failla:

   This firm, together with Pillsbury Winthrop Shaw Pittman LLP, is counsel to
Petitioners/Judgment-Creditors ("Petitioners") in the above-captioned action. Pursuant to
Section 9(B) of Your Honor's Individual Rules of Practice in Civil Cases, Petitioners write to
respectfully request that the Court permit the filing with partial redactions of their (i)
Memorandum of Law in Opposition to Third Party Emma Duo Liu's Motion to Modify the
Subpoena, (ii) the Declaration of Matthew A. Katz, Esq., and (iii) Exhibit A thereto.

   Petitioners seek to file their opposition documents with limited redactions to ensure that
such documents are consistent with the Court's February 9, 2024 Order permitting non-party
Emma Duo Liu to file various documents in support of her Motion to Modify Petitioners' Non-
Party Subpoena with redactions. (ECF No. 373.) Your Honor's February 9, 2024 Order
required the parties to meet and confer regarding necessary redactions to Ms. Liu's motion.
While such discussions remain ongoing, Petitioners seek to ensure that their opposition
documents contain redactions consistent with any eventual agreed-upon or court-ordered
redactions in Ms. Liu's filings.

Sincerely,

Matthew A. Katz
(212) 277 6315
mkatz@schlaw.com

Application GRANTED. The Clerk of Court is directed to maintain docket entries 377, 378, and 379 under seal, viewable only to the Court and the parties.

The Clerk of Court is further directed to terminate the pending motion at docket entry 374.

Dated: February 15, 2024   SO ORDERED.
            New York, New York

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE